

## **REMARKS**

### **I. Status of Claims**

Claims 1-8 are pending in this application. Claims 1 and 6 are independent. By this response, claims 1 and 6 are currently amended.

Claims 1 and 6 are objected to because of some minor informalities.

Claims 1-8 stand rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Takahashi et al. (USP 6,052,488) (hereinafter "Takahashi") in view of Klein et al. (USP 5,029,226) (hereinafter "Klein").

The Applicant respectfully requests reconsideration of the rejections in view of the foregoing amendments and the following remarks.

### **II. Claim Objections**

Claims 1 and 6 are objected to because of some minor informalities. The claims are amended to correct any perceived ambiguity.

### **III. Pending Claims**

Claims 1 and 6, the only independent claims, stand rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Takahashi in view of Klein.

The Applicant respectfully submits that claim 1 is patentable over the cited references at least because it recites, "a plurality of storages, in which each of said small blocks located according to said rules forming each of said large blocks has said pixel data independently, and by specifying an address assigned to each small block, a plurality of pixel data in a pertinent small block is simultaneously read out...a calculator comprising a coefficient matrix in which a matrix of plural coefficients are arranged, so that said plural coefficients are multiplied by each of respectively corresponding pixel data and summed up...and...wherein said calculator multiplies each of the pixel data in each of said small blocks forming said one large block, by said coefficient matrix rearranged in to a predetermined order."

The Applicant respectfully submits that claim 6 is patentable over the cited references at least because it recites, "said group of pixel data are divided into a plurality of small blocks

formed of said pixel data, a plurality of small blocks further form a large block, in each of which each small block is defined and arranged by certain rules, and a plurality of coefficients are arranged in the form of matrix to form a coefficient matrix...each of said small blocks located according to said rules forming each of said large blocks stores pixel data independently in each storage, and by specifying an address assigned to each small block, a plurality of pixel data in a pertinent small block is simultaneously read out from said storage...”

The Office Action indicates that every element in claims 1 and 6 of the present application is disclosed in Takahashi except “storages.” In order to cure this deficiency the Office Action cites Klein for disclosing the “storages.” Further, the Office Action indicates that claims 1 and 6 of the present application would be easily conceived by combining Takahashi with Klein. The Applicant respectfully disagrees.

Takahashi discloses art related to image data compression. For example, Takahashi describes in FIG. 25A (and in the associated description) that, in JPEG (a method of compressing image data), “DCT unit 61 divides the original image into a plurality of pixel blocks each consisting of 8 x 8 pixels, and represents image data of each pixel block as a matrix consisting of pixel data of 8 rows x 8 columns as shown in FIG. 25A, for example.”

In addition, Takahashi describes in FIGS. 2A to 2C (and in the associated description) that, in the FBTC method (a method of coding of fixed length), “an original image is divided into a plurality of pixel blocks each consisting of M x N (in the shown example, 4 x 4) pixels, and each pixel block is represented by a table consisting of pixel data  $X_{ij}$  ( $i, j=0$  to 3) of 4 rows and 4 columns. Each pixel data  $X_{ij}$  represents, in 256 tones, image density of the corresponding pixel.”

From the above figures and descriptions, it appears the Office Action recognizes that a “small block” and a “large block” are disclosed in claims 1 and 6 of the Applicant’s claims. However, FIG. 25A is an explanation in JPEG and FIGS. 2A to 2C are explanations in the FBTC method. In other words, these figures and/or their associated descriptions do not disclose the particular relation between the “small block” formed of a plurality of pixels and the “large block” formed of the plurality of the “small blocks” as in Applicant’s claims.

The “small block” and the “large block” in claims 1 and 6 of the present application are, “small block”: one in which group of pixel data are divided into a plurality of pixel data,” and

“large block”: one which is formed of a plurality of small blocks where, in each of large block, each of the small blocks is defined and arranged by certain rules.

As described above, there is neither a teaching nor suggestion in Takahashi of a “small block” and the “large block” arranged in close relation to each other.

Accordingly, the Applicant respectfully submits that in Takahashi, there is neither a teaching nor suggestion of each and every limitation of Applicant’s claims 1 and 6.

Further, Klein does not cure these deficiencies. Klein discloses RAM 90a-90d in FIG. 3; however, it neither teaches nor suggests a “small block” and “large block” as recited in Applicant’s claims 1 and 6.

The Applicant respectfully submits that for at least these reasons, claims 1 and 6, as well as their dependent claims, are patentable over the cited references.

**IV. Conclusion**

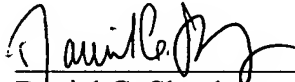
In light of the above discussion, Applicants respectfully submit that the present application is in all aspects in allowable condition, and earnestly solicits favorable reconsideration and early issuance of a Notice of Allowance.

The Examiner is invited to contact the undersigned at (202) 220-4420 to discuss any matter concerning this application. The Office is authorized to charge any fees related to this communication to Deposit Account No. 11-0600.

Respectfully submitted,

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